

Application for a Search Warrant

UNITED STATES DISTRICT COURT

for the
Western District of Washington

In the Matter of the Search of
SANTOKH RANGHAWA

Case No. MJ16-5125

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CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

APPLICATION FOR A SEARCH WARRANT FOR BLOOD SAMPLE

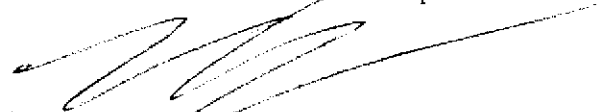
I, Thomas K. Craig, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that a sample of blood consisting of one of more tubes or vials should be taken from the following person (*identify the person to be searched*):

SANTOKH RANGHAWA

located in the Western District of Washington and that this blood sample is evidence of the following crime or crimes.

Driving While Under the Influence in violation of RCW 46.61.502, 18 U.S.C. § 13, and
36 C.F.R § 4.23 or 38 C.F.R. § 1.218

This application is based on the facts set forth in the attached affidavit which is incorporated herein as if fully set forth.



Applicant's signature

Thomas K. Craig,
Traffic Management, Collision Investigator, JBLM Police

Printed Name and Title

The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone on this 5th day of July, 2016.



Judge's signature

Brian A. Tsuchida, United States Magistrate Judge

1 STATE OF WASHINGTON)
2) ss
3 COUNTY OF PIERCE/JBLM)
4

5 **AFFIDAVIT**

6 I, Thomas K. Craig, a Traffic Management and Collision Investigator with the
7 JBLM Police, having been duly sworn, state as follows:

8 **AFFIANT BACKGROUND**

9 1. My training and experience relevant to the investigation discussed below
10 includes the following:

11 I have been a Traffic Management and Collisions Investigator with the Joint Base
12 Lewis McChord Police Department since 2014. I have conducted more than a hundred
13 collision investigations to include investigations for signs of impaired driving. I am
14 trained to detect signs of impairment by alcohol, drugs, and other chemicals. I have
15 attended multiple courses designed to detect and arrest persons suspected of impaired
16 driving. I have been trained in the instruction of Standardized Field Sobriety Testing
17 during a multiagency training course hosted by the Puyallup Police Department. I
18 attended the basic operator course of the BAC Datamaster CDM and am currently
19 qualified to administer BAC tests.

20 **INTRODUCTION AND PURPOSE OF THE AFFIDAVIT**

21 2. The purpose of this affidavit is to seek a search warrant to authorize me or
22 other law enforcement officers to direct a physician, a registered nurse, a licensed
23 practical nurse, a nursing assistant as defined in Chapter 18.88A of the Revised Code of
24 Washington (RCW), a physician assistant as defined in chapter 18.71A of the RCW, a
25 first responder as defined in chapter 18.73 of the RCW, an emergency medical technician
26 as defined in chapter 18.73 of the RCW, a health care assistant as defined in chapter
27 18.135 of the RCW, or any technician trained in withdrawing blood to extract a blood
28 sample consisting of one or more tubes or vials from SANTOKH RANGHAWA. This
warrant is requested for the purpose of gathering evidence of the following crime(s):

AFFIDAVIT OF CRAIG - I

UNITED STATES ATTORNEY
1201 PACIFIC AVENUE, SUITE 700
TACOMA, WASHINGTON 98402
(253) 428-380

1 Driving While Under the Influence in violation of RCW 46.61.502,
2 18 U.S.C. § 13, and 36 C.F.R § 4.23 or 38 C.F.R. § 1.218.

3 3. I am seeking to present this application for a search warrant by electronic
4 means because the natural metabolization of alcohol or drugs in the bloodstream may
5 result in the loss of this evidence in the time it would take to present a search warrant
6 application in a more traditional fashion.

7 **SUMMARY OF PROBABLE CAUSE**

8 4. As a result of my duties I am familiar with the jurisdictional boundaries of
9 Joint Base Lewis - McChord, Washington. The incident described below occurred within
10 these jurisdictional boundaries, an area within the special maritime and territorial
11 jurisdiction of the United States as defined in 18 U.S.C. § 7.

12 5. The initial contact with Santokh S. Randhawa occurred on 05 July 2016, at
13 approximately 1318 at 41st Division Dr at 41st Division Gate. Randhawa was observed
14 operating a blue sedan and attempting to enter the installation. When signaled to stop by
15 the gate personnel, the defendant ignored their hand and arm signals and continued onto
16 the base. The gate guard deployed the barriers in an attempt to prevent the driver from
17 gaining access to the installation. The driver was stopped before the barriers and upon
18 contact with the driver, the gate guards observed the defendant inside the vehicle's
19 driver's seat. The driver was removed from the vehicle and placed in custody by the
20 MP's working as gate guards. While removing the driver from the vehicle, the gate
21 guards detected a strong odor of an alcoholic beverage emitting from the vehicle and
22 observed an open container in between the defendant's thighs. I arrived on scene and
23 made contact with the defendant and detected a strong odor of an alcoholic beverage
24 emitting from his person. The defendant's eyes were glossy, droopy, and bloodshot. I
25 advised the subject of his Miranda rights verbally, which he waived and agreed to talk to
26 me. I asked the driver what had happened to which he stated that he was attempting to go
27 home to Salem, Oregon and took the wrong turn. The defendant's speech was heavily
28 slurred and slightly incomprehensible. I asked the defendant if he had consumed any

1 alcohol or drugs in the past twenty four hours to which he stated that he had at a party the
2 night prior. I asked the defendant if he had consumed any alcohol prior to being stopped
3 to which he stated that he had consumed half a beer. I asked the defendant if he had
4 taken any medication or drugs in the past twenty four hours to which he stated that he had
5 not. I asked the defendant if he was under the care of a doctor or dentist to which he
6 stated that he was being seen by a doctor because he had just had open heart surgery. I
7 asked the defendant if he had any injuries to which he stated he was weak. I asked if he
8 would volunteer to perform a series of standardized field sobriety tests (SFSTs). The
9 driver consented and volunteered to perform the SFSTs. I instructed the SFSTs
10 according to the National Highway Traffic Safety Administration standards. The SFSTs
11 showed obvious signs of impairment. The SFSTs were stopped for safety reasons when
12 the driver stated that he did not think he could continue on. The driver voluntarily
13 submitted to a preliminary breath test (PBT) which showed his BAC was .139. The
14 driver was apprehended and searched and transported to the Joint Base Lewis McChord
15 Police Station for further processing. Upon arrival at the police station the subject began
16 to complain of chest pain. Joint Base Lewis McChord Emergency Medical Service were
17 requested and rendered at the station. Medical personnel advised me that the subject was
18 displaying signs of a heart attack and due to the recent heart surgery would be transported
19 to the Emergency room.

20 6. Earlier on this day, due to the possibility that SANTOKH RANGHAWA
21 would be admitted for surgery and unavailable to execute this warrant, officers
22 considered this to involve "exigent circumstances" and withdrew a sample of
23 RANGHAWA's blood without his consent. At this point, we request a warrant to take
24 another sample of RANGHAWA's blood pursuant to judicial authorization.

25 7. A sample of blood extracted from SANTOKH RANGHAWA if taken
26 within a reasonable period of time after he last operated, or was in physical control of, a
27 motor vehicle, may be tested to determine his current blood alcohol level and to detect
28 the presence of any drugs that may have impaired his ability to drive. This search

1 warrant is being requested within approximately four hours and thirty minutes after
2 SANTOKH RANGHAWA ceased driving (was found in physical control of) a motor
3 vehicle.

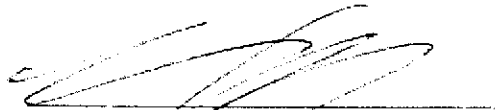
4 **CONCLUSION**

5 For the reasons stated above, I request authority to direct a physician, a registered
6 nurse, a licensed practical nurse, a nursing assistant as defined in chapter 18.88A of the
7 RCW, a physician assistant as defined in chapter 18.71A of the RCW, a first responder as
8 defined in chapter 18.73 of the RCW, an emergency medical technician as defined in
9 chapter 18.73 of the RCW, a health care assistant as defined in chapter 18.135 of the
10 RCW, or a technician trained in withdrawing blood to extract a blood sample consisting
11 of one or more tubes or vials from SANTOKH RANGHAWA.

12 I certify (or declare) under penalty of perjury under the laws of the United States
13 that the foregoing is true and correct to the best of my knowledge, information and belief.

14 This warrant application is to be presented electronically pursuant to the Western
15 District of Washington Local Criminal Rule CrR 41(d)(3).

16 Dated this 5th day of July, 2016

17
18 

19 Thomas K. Craig, Affiant
20 Traffic Management, Collision Investigator
21 JBLM Police

22
23 The above-named agent provided a sworn statement attesting to the truth of the
24 foregoing affidavit on this 5th day of July, 2016

25
26 

27 THE HONORABLE BRIAN A. TSUCHIDA
28 United States Magistrate Judge